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September 14, 2001

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Document Control Officer Document Control Processing, Mail Code 7407 U. S. Environmental Protection Agency 401 M. Street, SW Room G99, East Tower Washington, DC 20460



SUBJECT:

TSCA 8(e) SUBMISSION

Dear Sir or Madam,

. (" ") is submitting additional data which we believe to be reportable under TSCA 8(e). This information concerns, an experimental pyrethroid insecticide identified as

has been assigned CAS Number solely for R&D testing purposes on behalf of has recently imported ").

The first report of adverse effects from this test substance was sent to your Agency on . A second report on a preliminary dose , Document Control Number range-finding study was submitted on

28-day oral toxicity study of - in rats

Materials and Methods

Animals:

Crj:CD(SD) rats, 5 weeks-old (at start of administration), both

sexes, (6/sex/dose)

Pre-dose fasting:

None

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Doses:

0, 60, 120, 500 and 5000 ppm

Additionally, 6 rats/sex/dose group in dose levels of 0 (controls) and 5000 ppm were maintained untreated for 14 days, and were

used as the recovery group.

Administration route:

oral (in feed)

Administration period:

28 days

Range of body weights:

males: 135-155 g; females: 108-129 g once daily in the morning for 29 days

Observation periods: Procedures performed:

abnormal clinical signs; body weights (once weekly and on the day of necropsy), food consumption, urinalysis, hematology, blood chemistry, necropsy, organ weights, histopathological examination

Necropsy was performed after over-night fasting following the last administration of the test substance.

Results

Tremors were observed in rats of both sexes dosed at 5000 ppm (males at 474.7 mg/kg/day; and in females at 474.6 mg/kg/day; see summary of results on page 3 for specifics). Tremors first appeared on day 2 and persisted until the end of the treatment period.

Effects were noted in the livers of male rats at 500 ppm (48.5 mg/kg/day) and in females at 5000 ppm (474.6 mg/kg/day). These effects were increased absolute and relative liver weights (compared to the same weights found in the control animals).

All abnormal signs/symptoms disappeared or declined in the recovery groups, therefore the effects of the test substance appeared to be reversible by the first day of the recovery period for the tremors and on the day of necropsy for the liver effects. None of the animals died in this study. The NOAEL was determined to be 120 ppm (11.5 mg/kg/day) for males and 500 ppm (48.5 mg/kg/day) for females.

Please see table summarizing study results below.

Summary of study results

Dosage	60 ppm	120 ppm	500 ppm		5000 ppm	
No. of animals	6/sex	6/sex	6/sex		6/sex*	
Mortality	0	0	0		0	
Clinical signs	0	0	0		tremor ♂ ♀	
	1277		Week 1		3-6/12	3-5/12
			Week 2		2-4/12	1-4/12
			Week 3		2-4/12	1-3/12
			Week 4		0-2/12	0-1/12
Necropsy	0	0	effects on liver		effects on liver (♂) (♀)	
-		† Absolute liver weights	119%	n/a	151%	117%
		† Relative liver weights	115%	n/a	153%	123%
		Enlarged liver	2/6	n/a	6/6	3/6
		Hypertrophy	1/6	n/a	6/6	3/6

^{* 6} treatment and 6 recovery animals

Substantiation of CBI Claims

We wish to substantiate		mation in this letter be treated as
Confidential Business Informa	ation ("CBI"). All informa	ation deleted from the sanitized version of
this letter (copy attached) show	ald be treated as CBI.	wishes to protect its CBI during
the commercial development	of this chemical. Disclosi	ure of this information would harm
efforts to comme		Fer to the attached copy of our
letter to	of your Agency w	hich substantiates these CBI claims.
Should you have questions co. () - by telephone, (ncerning this submission,	please do not hesitate to contact me at
() - by telephone, (j - Oy telelax of via	c man anoabi

Sincerely yours,

Enclosure: (1)

cc: